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August 1, 2003

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554


Re: Texas RSA 1 Limited Partnership dba XIT Cellular  
CC Docket No. 94-102  
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Enhanced 911 ("E911") Rules,<sup>1</sup> Texas RSA 1 Limited Partnership dba XIT Cellular hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring the company's progress in deploying Phase II E911 technology.

Please contact the undersigned if you have any questions regarding this report.

Sincerely,

  
John Kuykendall  
Its Attorney

Enclosure

cc: John Muleta, Chief, Wireless Telecommunications Bureau  
David Solomon, Chief, Enforcement Bureau  
Qualex International

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<sup>1</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems: Order to Stay, CC Docket No. 94-102 (rel. July 26, 2002); Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings By Small Sized Carriers: Public Notice, CC Docket No. 94-102, DA 03-2113 (rel. June 30, 2003).

**TEXAS RSA 1 LIMITED PARTNERSHIP dba XIT CELLULAR**  
**E911 PHASE II INTERIM IMPLEMENTATION REPORT**  
**FOR TIER III CARRIERS**  
**August 1, 2003**

Texas RSA 1 Limited Partnership dba XIT Cellular ("XIT Cellular"), pursuant to the Commission's Enhanced 911 ("E911") Rules,<sup>1</sup> hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring XIT's progress in deploying Phase II E911 technology.

**I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):**

Seven separate Public Safety Answering Point ("PSAP") jurisdictions exist within XIT's service area. XIT has received a Phase I request from all the PSAPs and has accommodated all of their requests. XIT has not received a Phase II request from any of the PSAPs.

**The carrier's specific technology choice:**

XIT's system utilizes analog and digital technology, with the digital being TDMA. XIT has chosen to implement a network-based Phase II solution. XIT has been unable to identify any vendor that provides location-capable analog or TDMA handsets. Further, at this point in time, converting to a technology that supports a handset-based Phase II solution would not be in the subscribers' best interest. A large percentage of XIT's subscribers maximize their access to XIT's service through the use of three-watt analog phones. Lower watt digital cellular phones do not provide users with the same level of reliable service and, consequently, are not in demand by many of XIT's subscribers.

**III. Status on ordering and/or installing necessary network equipment:**

XIT is not required to implement a Phase II solution at this time because it has not received a PSAP request. Nevertheless, XIT has sought to coordinate implementation of E911 services with PSAPs in its service area.

The company estimates that the cost of implementing Phase II E911 in its system will be exorbitantly expensive.<sup>2</sup> It is unknown whether the State of Texas will provide funding to assist carriers with the cost of implementing a Phase II E911 solution.

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<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems: Order to Stay*, CC Docket No. 94-102 (rel. July 26, 2002); *Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings By Small Sized Carriers: Public Notice*, CC Docket No. 94-102, DA 03-2113 (rel. June 30, 2003).

<sup>2</sup> The only viable network-based vendors that have been identified are Grayson Wireless and TruePosition, which have solutions that are extraordinarily burdensome for a small and rural carrier. See, *The Rural Cellular Association Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification*: CC Docket No. 94-102, filed November 9, 2000 (citing record evidence that the cost of deployment of Grayson

**IV. The estimated date on which Phase II service will first be available in the carrier's network:**


XIT will continue to work toward becoming Phase II compliant. If and when XIT receives a Phase II request, and assuming the maintenance of current requirements and timeframes, XIT may find it necessary to seek waiver of some elements of the requirement to implement a Phase II solution due to the significant cost involved in upgrading its system, the additional towers necessary to meet the accuracy requirements, and/or the limited time in which to implement the solution given construction constraints.

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Wireless' solution is estimated to be approximately \$25,000 per cell site plus a \$65,000 central control system and the cost of TruePosition's solution is estimated to be approximately \$36,000 per cell site).

## **AFFIDAVIT OF JIMMY WHITE**

I, Jimmy White, General Manager for Texas RSA 1 Limited Partnership dba XIT Cellular, do hereby declare under penalty of perjury that I have read the foregoing "E911 Phase II Interim Implementation Report for Tier III Carriers" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

  
Jimmy White